

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**Glenn Stephens III  
Pro Se Plaintiff**

**v.**

**Melvin R. Cohick, Lori Cohick Barner,  
Leroy H. Keiler III, Esq., Dale A. Tice, Esq.,  
Law Firm of Carpenter, Harris & Flayhart  
Defendants**

**STATEMENT OF UNCONTESTED FACTS**

1. On March 10 2020, Melvin Dick Cohick and his daughter Lori evicted Plaintiff from the home of Plaintiff's Uncle Weldon Cohick.
2. The CDC Eviction Moratorium banned evictions at that time.
3. The CDC Eviction Moratorium was Constitutional at that time.
4. Plaintiff was current on his rent at the time.
5. Dick Cohick stated that his lawyer Dale Tice approved the unlawful eviction.
6. Tice had a legal duty to advise Cohick and Barner against the unlawful eviction.
7. Tice breached that duty.
8. The Attorney for the Estate of Weldon Cohick, Leroy Keiler, had a fiduciary duty to prevent the eviction.
9. Keiler breached that duty.
10. Plaintiff provided Tice's law firm with a copy of the CDC's Eviction Declaration.  
Attached Ex.1.
11. Plaintiff incurred money damages – the cost of covering the difference between his rent at his Uncle's and the high cost of rent available during the CDC ban.
12. Plaintiff suffered extreme emotional distress as a result of the illegal eviction.
13. Subsequently, Plaintiff's sister, Leslie Royer Stevenson, the niece of Dick and Weldon Cohick and the cousin of Dick's daughter Lori, expressed her opposition to the unlawful eviction to her cousin and former Defendant Diane Hill Jones.

Respectfully submitted,

/s/ Glenn Stephens III